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April 7, 2020

By ECF and Email

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Nkanga*, 18 Cr. 713 (JMF)

Your Honor:

We write respectfully to update the Court on the status of Dr. Nkanga's 2255 motion. After speaking this morning with the Case Openings Unit and the Clerk's office, we will be hand-delivering a physical copy of the 2255 filing to the courthouse today and expect that electronic filing will be permitted by the end of the week. For now, we respectfully request that the Court consider the email-submitted filing and, if the Court deems it appropriate, ask the Government to respond to the 2255 bail application and/or confer with defense counsel about the possibility of an agreed-upon bail package. To the extent it impacts the Court's considerations, we do not presently intend to submit another filing on Dr. Nkanga's behalf before this Court.

Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman
Daniel Parker
Joshua Horowitz
Benjamin Silverman
Attorneys for Nkanga Nkanga

cc: All Counsel of Record (by email and ECF)